

Oak Ridge Reservation EMDF ROD (Draft 1 issued on 7/12/21) – Status of Remaining Issues

| Issue | Progress | Next steps | Needed for public comment |
|---|--|---|---------------------------|
| ARARs in ROD | EPA, TDEC and DOE participated in three discussion/resolution meetings. All parties are aware of the issues. EPA comments will not be a surprise. | EPA will issue preliminary ARAR comments on 9/03/21; final comments NLT 9/27/21. | |
| Mercury Management Approach | EIT developed draft on 8/16/21. DOE and TDEC comments received. ORC comments pending. | EIT to revised approach per comments. Anticipate resolution by 9/15. | ✓ |
| Effluent limits for Radionuclides | Project team developing water quality based effluent limits. 1) Fish consumption rates being negotiated; 2) Assimilative capacity of receiving stream: team suggesting variance from CWA guidance (TN may not agree, WD may not agree), under discussion; 3) “secondary” COC list being negotiated; 4) Treatment of challenging rads being negotiated. 5) Fall fish sampling event pending (post ROD mod if needed) | Anticipate project team recommendation by 10/1/21. Some indication that DOE may not endorse project team result. | ✓ |
| Waste Acceptance Criteria (WAC) | EPA has no further comments. TDEC and DOE continue to negotiate. | | ✓ |
| Comments on D1 ROD | Preliminary draft technical comments (including hydro and eco risk) submitted on 8/11/21. ORC comments received on 8/27/21. HQ comments received 8/30/21 with a few to follow. | 1) Consolidate all comments NLT 9/13; 2) Resolve conflicts in R4/HQ comments; communicate significant comments to TDEC NLT 9/17; 3) R4 briefings, as needed 9/24; 4) Formal comments to DOE NLT 9/27/21; 5) DOE to prepare D2 ROD (tent. 30 days) | |
| Focused Feasibility Study for Wastewater | Submitted to EPA on 6/23/21 EPA commented on 7/22/21 | EPA awaiting DOE’s revision. DOE to revise FFS, including addition of effluent limits for radionuclides and Hg. Finalize before ROD is signed. | |